

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

BENJAMIN WASSON, Individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

LOGMEIN, INC., WILLIAM R. WAGNER,  
AND EDWARD K. HERDIECH

Defendants.

Civil Action No. 1:18-cv-12330-ADB

**JOINT STIPULATION  
REGARDING BRIEFING SCHEDULE**

The parties submit this Joint Stipulation and Proposed Order to set a briefing schedule for an amended complaint and motion to dismiss, following the Court’s selection of a lead plaintiff in this putative securities fraud class action.

Plaintiff Benjamin Wasson filed this suit on August 20, 2018 in the Central District of California. (Dkt. No. 1.) On October 5, 2018, Defendants LogMeIn, Inc. (“LogMeIn”), William R. Wagner, and Edward K. Herdiech (collectively, “Defendants”) filed a motion to transfer the case to this District, where LogMeIn is headquartered and where the individual defendants reside. (Dkt. No. 13.)

On October 19, 2018, several new plaintiffs filed motions for appointment of lead counsel and lead plaintiff. (Dkt. Nos. 17-18, 21-22, 25-26). Upon reviewing the competing motions, all of the plaintiffs withdrew their motions, except for co-plaintiffs Robert Daub and Larry Pollock, who have the largest financial interest in LogMeIn, and who are represented by Glancy Prongay & Murray, LLP (“Glancy”). (Dkt. Nos. 28, 31.)

On November 2, 2018, the District Court in the Central District of California granted Defendants' motion to transfer this case. The case was transferred to this District on November 6, 2018 and assigned to this Court on November 16, 2018.

Counsel for Defendants have consulted with Glancy, the presumptive lead counsel (given that the other movants withdrew), and both parties agreed to the following briefing schedule, once the Court formally appoints a lead plaintiff and lead counsel:

- Amended Complaint – Due 60 days after Court appoints lead plaintiff and lead counsel
- Motion to Dismiss (or other response) – Due 60 days after Plaintiff files an Amended Complaint
- Opposition to Motion Dismiss (if applicable) – Due 45 days after Defendants file a Motion to Dismiss
- Reply in support of Motion to Dismiss (if applicable) – Due 30 days after Plaintiff files an opposition

This schedule is set forth in the Proposed Order filed concurrently herewith, which the parties respectfully request that the Court grant.

Dated: December 7, 2018

Respectfully submitted,

/s/ Jason M. Leviton

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 7th day of December, 2018.

/s/ William J. Trach

William J. Trach